

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
MINHYE PARK,

Plaintiff,

-against-

DAVID DENNIS KIM, M.D.,

Defendant.
-----X

Index No.: 1:20-cv-02636

NOTICE OF MOTION TO COMPEL


PLEASE TAKE NOTICE that upon the accompanying declaration of Hayley Newman, Esq., the exhibits attached hereto, and the accompanying Declaration, Rule 37 Certification and Memorandum of Law in Support of Defendant's Motion to Compel, dated July 29, 2021, Defendant, David Dennis Kim, M.D., will move on August 11, 2021 for an Order pursuant to Rule 37(a) of the Federal Rules of Civil Procedure granting Defendant's motion for an order compelling the production of discovery, documents and answers to interrogatories.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's July 22, 2021 Order, Plaintiff's oppositions papers shall be served on or before August 5, 2021.

Dated: New York, New York
July 29, 2021

Respectfully submitted,

HEIDELL, PITTONI, MURPHY & BACH, LLP

By: 

Hayley Newman (HN 5509)
99 Park Avenue
New York, New York 10016
Tel: (212) 286-8585
Fax: (212) 490-8966
hnewman@hpmb.com

Attorneys for Defendant
DAVID DENNIS KIM, M.D.

VIA ECF

TO: Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, New York 11556